

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

MOBILE MED WORK HEALTH  
SOLUTIONS, INC., *et al.*,

*Plaintiffs,*

v.

JOSHUA MOORE, *et al.*,

*Defendants.*

CIVIL ACTION NO. 1:24-CV-01219-RP

**JOINT MOTION TO ENTER CONFIDENTIALITY AND PROTECTIVE ORDER**

The Parties ask the Court to enter the proposed Confidentiality and Protective Order attached hereto as Exhibit A<sup>1</sup> and in support state as follows:

1. The Parties have conferred and stipulated to a Confidentiality and Protective Order in the form set out in Appendix H-2 to the Western District of Texas's Local Rules, which is attached hereto as Exhibit A.
2. This proposed Confidentiality and Protective Order is necessary to ensure the confidentiality of certain sensitive information and documents that will be exchanged in this case.
3. This Court has good cause to enter that proposed Order under Rule 26 of the Federal Rules of Civil Procedure.
4. The Parties thus respectfully request that this Court enter the proposed Confidentiality and Protective Order, attached hereto as Exhibit A.

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<sup>1</sup> Defendants jointly submit this request in light of the Court's order granting in part and denying in part Plaintiffs' motion for expedited discovery. Dkt. 25 (Order). Defendants do so without waiving any rights to have this matter resolved in arbitration or to a stay under 9 U.S.C. § 3 or 15 U.S.C. § 78u-4.

Dated: November 7, 2024

Respectfully submitted,

/s/ Paul Stancil

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 7th day of November, 2024, I caused the foregoing document to be electronically filed using the CM/ECF system, which automatically sends notification of such filing to all counsel of record.

*/s/ Christopher R.J. Pace*  
Christopher R.J. Pace